

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.,*

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**STATE DEFENDANTS' NOTICE OF FILING
DISCOVERY DISPUTE DOCUMENT**

Pursuant to this Court's Order on discovery disputes, [Doc. 1359], State Defendants file their document with the checkboxes filled in on the following pages.

This 7th day of April, 2022.

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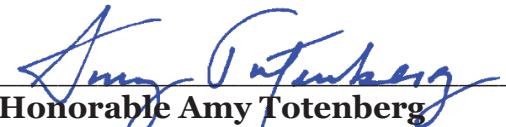
Discovery Dispute	Whether the dispute has been resolved:	Whether the dispute requires resolution before MSJ filings:
The State Defendants' and the Plaintiffs' dispute regarding the adequacy of the State's 30(b)(6) witnesses' deposition testimony	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Plaintiffs' dispute regarding the State's production of certain investigative files	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Plaintiffs' dispute regarding a 30(b)(6) deposition of Fortalice	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Plaintiffs' dispute regarding depositions of Secretary of State Raffensperger and Deputy Secretary Fuchs	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Coalition Plaintiffs' dispute regarding Dekalb and Fulton Counties' election records	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The Fulton County Defendants' and the Coalition Plaintiffs' dispute regarding the inspection of certain original paper ballots	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Coalition Plaintiffs' dispute regarding the 30(b)(6) deposition of the Coalition	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Coalition Plaintiffs' deposition dispute regarding the Coalition's associational standing witnesses	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The State Defendants' request for discovery related to Dr. Halderman's methods	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

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Dr. Stark's Amended Expert Report

Yes	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>
No	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

IT IS SO ORDERED this 5th day of April, 2022.


Honorable Amy Totenberg
United States District Judge

L.R. 7.1(D) CERTIFICATION

I certify that this Notice has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Response has been prepared using 13-pt Century Schoolbook font.

/s/ Bryan P. Tyson
Bryan P. Tyson